

THE STATE OF ALABAMA
MONTGOMERY COUNTY

Circuit Court of Montgomery County, _____ MARCH _____ Term, A.D. 2002

COUNT I: The Grand Jury of said County charge that, before the finding of this indictment,

Cap. mur.

KONDELL DEMOND WRIGHT,

whose name is otherwise unknown to the Grand Jury, did intentionally cause the death of Alvin Reynolds by shooting him with a firearm and he caused the death during the time that he knowingly and unlawfully entered or remained unlawfully in the dwelling of Jesse James Murray with intent to commit the crime of Murder and/or Robbery and/or Theft of Property therein, and while effecting entry or while in the dwelling or in immediate flight therefrom, he or an accomplice was armed with a deadly weapon, a firearm, in violation of Section 13A-5-40, against the peace and dignity of the State of Alabama.

EXHIBIT B

COUNT II: The Grand Jury of said County further charge that, before the finding of this indictment,

Cap. Mur.

KONDELL DEMOND WRIGHT,

whose name is otherwise unknown to the Grand Jury, did intentionally cause the death of Alvin Reynolds by shooting him with a firearm and caused said death during the time that Kondell Demond Wright, was in the course of committing a theft of lawful currency and/or coinage of the United States of America, better descriptions of which are unknown to the Grand Jury, of some value, the value of which is unknown to the Grand Jury, the property of Alvin Reynolds or another, by the use of force against the person of Alvin Reynolds, with intent to overcome his physical resistance or physical power of resistance, while the said Kondell Demond Wright or an accomplice, was armed with a deadly weapon or dangerous instrument, to-wit: a firearm, a better description of which is unknown to the Grand Jury, in violation of Section 13A-5-40 of the Code of Alabama 1975 as amended, against the peace and dignity of the State of Alabama.

B-2

COUNT III: The Grand Jury of said County further charge that, before the finding of this indictment,

Consp. Rob 1

KONDELL DEMOND WRIGHT,

whose name is otherwise unknown to the Grand Jury, with the intent that conduct constituting an offense, to-wit: Robbery I, be performed, did agree with one or more person, to-wit: Derrick Barnes, to engage in or cause the performance of such conduct, and one or more such persons did an overt act to effect an objective of the agreement, to-wit: did arm himself with a firearm, did wear a mask and/or face covering; did plan and/or discuss how to execute a robbery or theft, in violation of Section 13A-4-3 of the Code of Alabama, against the peace and dignity of the State of Alabama.

B-3

COUNT IV: The Grand Jury of said County further charge that, before the finding of this indictment,

Robl

KONDELL DEMOND WRIGHT,

whose name is otherwise unknown to the Grand Jury, did, in the course of committing a theft of lawful currency and/or coinage of the United States of America, of some value, the value of which is unknown to the Grand Jury, better descriptions of which are unknown to the Grand Jury, use force against the person of the owner or any person present, Markia Bennett, with intent to overcome her physical resistance or physical power of resistance, or threaten the imminent use of force against the person of the owner or any person present, Markia Bennett, with intent to compel acquiescence to the taking of or escaping with the property, while the said Kondell Demond Wright or an accomplice was armed with a deadly weapon or dangerous instrument, a firearm, a better description of which is unknown to the Grand Jury, in violation of Section 13A-8-41 of the Code of Alabama, against the peace and dignity of the State of Alabama.

B-4

COUNT V: The Grand Jury of said County further charge that, before the finding of this indictment,

Assault 1

KONDELL DEMOND WRIGHT,

whose name is otherwise unknown to the Grand Jury, did, recklessly engage in conduct to-wit: shooting into an occupied building, which manifested extreme indifference to the value of human life and created a grave risk of death to a person other than the said Kondell Demond Wright and/or Derrick Barnes, to-wit: Markia Bennett, by shooting her with a firearm, in violation of Section 13A-6-20(a)(3) of the Code of Alabama, against the peace and dignity of the State of Alabama.

B-5

COUNT VI: The Grand Jury of said County further charge that,
Assault before the finding of this indictment,

KONDELL DEMOND WRIGHT,

whose name is otherwise unknown to the Grand Jury, did, in the course of an
in furtherance of the commission or attempted commission of another crime,
to-wit: Murder and/or Robbery and/or Theft of Property, or of immediate
flight therefrom, cause serious physical injury to another person, to-wit:
Markia Bennett, by shooting her with a firearm, in violation of Section
13A-6-20(a)(4) of the Code of Alabama,

against the peace and dignity of the State of Alabama.

Elaine L. Beahm
District Attorney, Fifteenth Judicial Circuit of Alabama

B-6

02-325 ECR

CJ NO. 285

THE STATE OF ALABAMA

v.
KONDELL DEMOND WRIGHT

B/M, DOB 09/23/82, 7406 Hwy 94 Ramer

SID. NO. ARREST DATE

FOR

CAPITAL MURDER AND CONSPIRACY TO COMMIT
ROBBERY I AND ASSAULT IPresented in open Court by the Foreperson of
the Montgomery County Grand Jury in the pres-
ence of 16 other members of
the Grand Jury and filed this 8th day of
Mar 02
Robert E. Evans
Clerk of the Circuit Court of Montgomery County

A TRUE BILL

Susan B. Smith
Foreperson of Grand Jury

No Prosecutor

BAIL IN THIS CASE IS FIXED AT

NO BOND

Shelly D. Green
Judge of Circuit Court of Montgomery County

CC NO.

STEP NO.

WITNESSES

SEE ATTACHED WITNESSES

B-7